

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

JANE GABRIEL,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 5:18-cv-06158-DGK
)	
ANDREW COUNTY, MISSOURI)	
and BRYAN ATKINS,)	
)	
Defendants.)	

**UNOPPOSED MOTION FOR LEAVE
TO FILE BRIEF IN EXCESS OF PAGE LIMITS
SET BY LOCAL RULE**

COMES NOW, Plaintiff, by and through her attorneys of record, and states as follows:

1. This case was originally filed in the United States District Court for the Western District of Missouri.
2. Plaintiff intends to file their response to Defendant's Motion for Summary Judgment which is due today (December 16, 2019). The motion has been completed and it exceeds the fifteen-page limit set by Local Rule 7.0(d). The motion is twenty-four pages in length, exclusive of the table of contents, table of authorities, and statements of fact.
3. The additional pages are necessary to address Defendants' motion including sovereign and qualified immunity under 42 U.S.C. § 1983.
4. The length of the brief is necessary to fully address the issues and to discuss genuine disputes of fact and the lack of entitlement of judgment as a matter of law.
5. Plaintiff's counsel has asked opposing counsel if they have objections to his filing a motion to remand in excess of the page limits, opposing counsel does not object.

6. Accordingly, Plaintiff moves the Court for an order permitting her to file her Response to Defendant's Motion for Summary Judgment of twenty-four pages in length, exclusive of the table of contents and the table of authorities.

Respectfully submitted,

**MURPHY, TAYLOR, SIEMENS &
ELLIOTT, P.C.**

By: /s/ Benjamin S. Creedy
Benjamin S. Creedy – #56371
bencreeedy@mtselaw.com
Laurna Alumbaugh – #71764
laurnaalumbaugh@mtselaw.com
3007 Frederick Avenue
St. Joseph, Missouri 64506
Telephone: (816) 364-6677
Facsimile: (816) 364-9677

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was sent via the Court's electronic filing system on this 16th day of December, 2019 to all attorneys of record.

/s/ Benjamin S. Creedy